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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

DANA ANDREW, as Legal Guardian of
RYAN T. PRETNER, and RYAN T. PRETNER,
individually,

Plaintiffs,

vs.

CENTURY SURETY COMPANY, a foreign
Corporation; MEADOWBROOK INSURANCE
GROUP, a foreign corporation; and DOES I through
X, inclusive,
Defendants.

CASE NO.: 2:12-cv-00978-APG-PAL

**STIPULATION AND ORDER
TO EXTEND DEADLINE TO FILE
MOTIONS FOR
RECONSIDERATION**

IT IS HEREBY STIPULATED AND AGREED between Plaintiffs DANA ANDREW, as legal guardian on behalf of Ryan T. Pretner, and RYAN T. PRETNER, through their counsel of record, Dennis M. Prince, Esq. and Kevin T. Strong, Esq. of PRINCE LAW GROUP, and Defendant CENTURY SURETY COMPANY, through its counsel of record, Maria Louise Cousineau, Esq. of COZEN O'CONNOR; J. Ric Gass, Esq., David J. Turek, Esq., and Stephen T. Trigg, Esq. of GASS WEBER MULLINS LLC; and Martin J. Kravitz, Esq. of CHRISTIAN, KRAVITZ, DICHTER, JOHNSON & SLUGA, LLC, that the deadline for the parties to file their respective motions for reconsideration shall be continued from July 1, 2019 to July 17, 2019. The current deadline for the parties to file their respective motions for reconsideration is July 1, 2019, which the Court set in its May 31, 2019 Scheduling Order (ECF No. 280).

The primary purpose for the parties' requested stipulation is that lead counsel for Plaintiffs, Dennis M. Prince, Esq., devoted substantial time and resources in June to establish his new law



1 practice. While Mr. Prince continues to transition several cases from his previous law office to his
2 new law office, this process is nearly complete. Additionally, Kevin T. Strong, Esq., who is also
3 counsel for Plaintiffs, took an extended period away from the office during June to celebrate his
4 wedding, which took place on June 15, 2019 and honeymoon, which took place the week thereafter.
5 Counsel for Defendant Century Surety Company has graciously agreed to a sixteen (16) day extension
6 through and until July 17, 2019 for the parties to file their respective motions for reconsideration.
7 This is the first extension requested in connection with the motions for reconsideration.

8 Considering these circumstances and pending the Court's approval, the parties respectfully
9 request this Court to approve the foregoing stipulation.

10 DATED this 28th day of June, 2019.

DATED this 28th day of June, 2019.

11 **PRINCE LAW GROUP**

GASS WEBER MULLINS

12 /s/ Dennis M. Prince
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ORDER

25 IT IS SO ORDERED.

26 Dated: July 8, 2019.



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28 UNITED STATES DISTRICT COURT JUDGE